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OFFICE OF RADIATION SAFETY
UNIVERSITY HALL, 3rd FLOOR

BERKELEY, CALIFORNIA 94720

June 23, 1999

DEPARTMENT OF HEALTH AND HUMAN SERVICES
Food and Drug Administration 21 CFR Part 179
Dockets Management Branch [Docket No. 98N-1038]
5630 Fishers Lane, Room 1061
Rockville MD 20852

RE: IRRADIATED FOOD LABELING [Docket No. 98N-1038]

Dear FDA Dockets Management Branch:

I have reviewed several of the position statements sent in by public comment regarding the labeling of irradiated food items. There is no doubt that you are faced with a definite variety of opinions. As a health physicist, a professional in radiation safety, I thought it appropriate to express my thoughts on the topic.

I support the labeling of irradiated primary food items with the radura and with the phrase "treated by irradiation" or any variance thereof. However, I believe the labeling should not be any larger than the typical ingredient food labels. Additionally, the labeling should only be on food items that are single ingredient products and not when used as ingredients or in restaurants. I will be brief with my reasoning.

My profession attempts everyday to educate people, professional and general public alike, of the risks and benefits associated with radiation. The consumption of food items that have been irradiated is one aspect that has to be addressed. It is my experience that people do not believe irradiated food has become radioactive. That is a great step. However, it is also my experience that people do not acknowledge the presence of the radura on food labels, primarily due to an ignorance of the purpose of the symbol.


Through efforts made by yourselves and others, by my profession, and by opponents to the food irradiation, the public will be made aware of the radura and its meaning. Since irradiation of food items has been approved because of the benefits derived from the process, it should be made known. There are those who will opt not to purchase the food as they recognize the labeling and that should be their option. However, I believe it would be going too far to require the labeling of restaurant food items or food items in which irradiated food items have been included as an ingredient. Those situations

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would seem to me to be a blatant expression of warning and would deviate from the informational purpose of the labeling.

In conclusion, my professional opinion is that the labeling of the irradiated food items as I have outlined would impress upon the minds of the people the testimony of the FDA that irradiation of food items is a beneficial process. Such labeling would convey that there is nothing to hide and that an active attempt is being made to educate the people of the benefits of food irradiation. Nevertheless, I trust your judgement as you review the overall scope of the decision.

Sincerely,



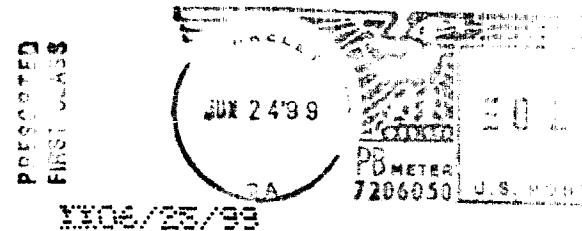
Gregory R. Fairchild
Health Physicist

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